

REMARKS

The Office Action dated May 1, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

New claims 71 and 72 have been added. No new matter has been added. Support for the new claims may be found at least on page 4, lines 13-16 of the specification. Claims 24, 45, and 47-72 are currently pending in the application and are respectfully submitted for consideration.

Claims 24, 45, 47-55, and 62 were rejected under 35 U.S.C. §102(b) as being anticipated by Neubauer (U.S. Patent No. 5,953,673). This rejection is respectfully traversed for at least the following reasons.

Claim 24 recites a system including a telecommunication network, a first station, and a plurality of second stations. The first station is configured to request a connection with at least one of said plurality of second stations, said connection request comprising a location criteria to be satisfied by at least one second station. The telecommunication network comprises at least one store configured to store location information for at least some of said second stations and a selector configured to select at least one of the second stations for connection when said connection request is received in dependence on the location information stored in the store and the location criteria in the received connection request. The telecommunications system is further configured to connect the first station to the at least one second station selected by the selector.

Claim 45, upon which claims 63-70 are dependent, recites a method which includes defining, at a first station of a telecommunication network, a location criteria to be satisfied by at least one second station, requesting a connection with at least one second station satisfying said location criteria, and selecting at least one of the second stations for connection when said connection request is received based on stored location information and the location criteria in the received connection request. The method also includes establishing a connection between said first station and said at least one second station satisfying said location criteria.

Claim 47 recites a system including a telecommunication network, a first station, a plurality of second stations, defining means for defining at the first station a location criteria to be satisfied by at least one second station, and requesting means for requesting a connection with at least one second station satisfying said criteria. The system includes selecting means for selecting at least one of the second stations for connection when said connection request is received in dependence on stored location information and the location criteria in the received connection request, and establishing means for establishing a connection between said first station and said at least one second station satisfying said location criteria.

Claim 48, upon which claims 49-54 are dependent, recites a method including transmitting a request for a connection with one of a plurality of stations, the request comprising a location criteria to be satisfied by at least one of the stations. The method further includes storing location information for the stations in a register, and selecting at

least one of the stations for the connection based on the location information stored in the register and the location criteria.

Claim 55, upon which claims 56-61 are dependent, recites an apparatus comprising a transmitter configured to transmit a request for a connection with one of a plurality of stations, the request comprising a location criteria to be satisfied by at least one of the stations. The apparatus further includes a register configured to store location information for the stations, and a selector configured to select at least one of the stations for the connection based on the location information stored in the register and the location criteria.

Claim 62 recites an apparatus comprising transmitting means for transmitting a request for a connection with one of a plurality of stations, the request comprising a location criteria to be satisfied by at least one of the stations. The apparatus further includes storing means for storing location information for the stations, and selecting means for selecting at least one of the stations for the connection based on the location information stored in the register and the location criteria.

Claim 71 recites a computer program, embodied on a computer-readable medium, the computer program configured to control a processor to perform a method. The method comprises defining, at a first station of a telecommunication network, a location criteria to be satisfied by at least one second station, requesting a connection with at least one second station satisfying said location criteria, selecting at least one of the second stations for connection, when said connection request is received, based on stored

location information and the location criteria in the received connection request, and establishing a connection between said first station and said at least one second station satisfying said location criteria.

Claim 72 recites a computer program, embodied on a computer-readable medium, the computer program configured to control a processor to perform a method. The method comprises transmitting a request for a connection with one of a plurality of stations, the request comprising a location criteria to be satisfied by at least one of the stations, storing location information for the stations in a register, and selecting at least one of the stations for the connection based on the location information stored in the register and the location criteria.

Therefore, the present invention is directed, in part, to connecting a user of a first station to one of the second stations based on location information for the second stations. one of the advantages provided by the claimed invention is that the location information for the second stations does not need to be displayed to the user of the first station. Similarly, the criteria for selecting which of the second stations is connected to the first station can be determined by the telecommunications system, rather than by the user of the first station. Furthermore, the telecommunications system may determine the second station that is to be connected to the first station based on criteria not available to the user of the first station.

As will be discussed below, Neubauer fails to disclose or suggest the elements of the claims, and therefore fails to provide the features and advantages discussed above.

Neubauer discloses a method of establishing a connection between a calling subscriber of a telecommunications network and a called mobile target subscriber of a cellular digital mobile radio network, in which a group call number which identifies a target group of mobile subscribers to which the mobile target subscriber belongs is dialled by the calling subscriber. Information identifying the location of the calling subscriber is received by an access mobile switching system, and forwarded to a home location register of the mobile radio network. The subscriber data on the mobile subscribers of the target group defined by the group call number is called up by a service control point, and is transmitted to the home location register. The information on the locations of the mobile subscribers of the target group and the information on the location of the calling subscriber is received and evaluated by the service control point and, from this information, the mobile target subscriber is selected by the service control point and notified to the home location register. A connection with the selected mobile target subscriber is established by the mobile switching system in the mobile radio network in whose area of responsibility the selected mobile target subscriber is located.

Applicants respectfully submit that Neubauer fails to disclose or suggest all of the elements of the present claims. For example, Neubauer does not disclose or suggest “wherein the first station is configured to request a connection with at least one of said plurality of second stations, said connection request comprising a location criteria to be satisfied by at least one second station,” as recited in claim 24. Neubauer also fails to disclose or suggest “requesting a connection with at least one second station satisfying

said location criteria; selecting at least one of the second stations for connection, when said connection request is received, based on stored location information and the location criteria in the received connection request,” as recited in claim 45 and similarly recited in claims 47 and 71. Neubauer also fails to disclose or suggest “transmitting a request for a connection with one of a plurality of stations, the request comprising a location criteria to be satisfied by at least one of the stations,” and “selecting at least one of the stations for the connection based on the location information stored in the register and the location criteria,” as recited in claim 48 and similarly recited in claims 55, 62, and 72.

Neubauer, as discussed above, only discloses that a user of a first station dials a group call number which identifies the target group of mobile subscribers. If the call comes from the subscriber SA' of the mobile radio network PLMN' and a connection with the service control point SCP exists in that network, the determination of the location of the subscriber SA' takes place in that mobile radio network PLMN' (Neubauer, column 7, lines 7-11). The telecommunications network in Neubauer then determines the location of the calling party, as well as the members of the target group and makes the connection between the calling party and one of the members based on their location by, for example, connecting to the target subscriber closest to the calling party. Neubauer does not disclose or suggest that location criterion is sent in a connection request.

Therefore, according to Neubauer, the user making the call cannot send any location criteria in order to guide the telecommunications network in making a selection.

For example, it may be that a user wishes to call a taxi for a friend in a different location from where the user is currently located. According to embodiments of the present invention, the user of the first station may specify the location criteria in terms of the location of their friend and the telecommunications network could then use this information in order to select a taxi for connection. Neubauer does not disclose or suggest this capability.

For at least the reasons discussed above, Applicants submit that Neubauer fails to disclose or suggest all of the elements of claims 24, 45, 47-55, 62, 71 and 72. Therefore, Applicants respectfully request that the rejection of claims 24, 45, 47-55, 62, 71 and 72 be withdrawn.

Claims 24, 45, 47-52, 54-67, 69, and 70 were rejected under 35 U.S.C. §102(b) as being anticipated by Tognazzini (EP 0810803). This rejection is respectfully traversed for at least the following reasons.

Tognazzini discloses an apparatus and method for establishing communications between a calling station and one or more called stations based on information stored in a database. A receiver receives a communication request including a query specifying at least one criterion. A comparator compares information stored in the database with the criterion, and a transmitter responds to the communications request when the information in the database satisfies the criterion.

Applicants respectfully assert that Tognazzini fails to disclose or suggest all of the elements of the claimed invention. For example, Tognazzini fails to disclose or suggest,

at least, that the “telecommunication network comprises at least one store configured to store location information for at least some of said second stations and a selector configured to select at least one of the second stations for connection when said connection request is received in dependence on the location information stored in the store and the location criteria in the received connection request,” as recited in claim 24. Tognazzini also does not disclose or suggest that “selecting at least one of the second stations for connection, when said connection request is received, based on stored location information and the location criteria in the received connection request,” as recited in claim 45 and similarly recited in claim 71. Furthermore, Tognazzini fails to disclose or suggest, at least, “selecting means for selecting at least one of the second stations for connection when said connection request is received in dependence on stored location information and the location criteria in the received connection request,” as recited in independent claim 47. Similarly, Tognazzini fails to disclose or suggest “selecting at least one of the stations for the connection based on the location information stored in the register and the location criteria,” as recited in claim 48 and similarly recited in claims 55, 62, and 72.

Tognazzini teaches that location information for the second stations is displayed to a user of the first station and the user of the first station selects which one of the second stations is to be connected by touching an icon on the display screen (Tognazzini, Column 13, lines 34-42). Figure 10 of Tognazzini illustrates that station 1010 originates a call over cellular system 1000 and individual stations 1020, 1030, and 1040, which each

satisfy the query originated by station 1010, respond to the cellular system 1000 indicating that they satisfy the criteria.

According to embodiments of the present invention, on the other hand, a first station which requests a connection with at least one second station satisfying a location criteria and the telecommunications network then selects, when the connection request is received, which of the second stations is to be connected depending upon stored location information from the second station and the location criteria in the received connection request. The first station is then connected to the at least one second station selected by the telecommunication network. Consequently, one of the advantages provided by the claimed invention is that the location information for the second stations does not need to be displayed to the user of the first station.

Tognazzini fails to disclose selecting at least one of the second stations for connection, when said connection request is received, based on stored location information and the location criteria in the received connection request. Rather, Tognazzini only discloses connecting to a station that is selected by the user.

Therefore, Applicants submit that Tognazzini fails to disclose or suggest all of the elements of claims 24, 45, 47-52, 54-67, 69, and 70-72. Accordingly, Applicants respectfully request that the rejection of claims 24, 45, 47-52, 54-67, 69, and 70-72 be withdrawn.

Claim 53 was rejected under 35 U.S.C. §103(a) as being unpatentable over Tognazzini in view of De Brito (U.S. Patent No. 6,529,735). This rejection is respectfully traversed for at least the following reasons.

Applicants respectfully submit that this rejection is improper since De Brito does not constitute a valid prior art reference with respect to the present application. Since De Brito is an international application filed before November 29, 2000, the effective filing date of De Brito is the §371(c)(1), (2) and (4) date (MPEP §706.02(f)(1)). As shown on the cover thereof, the §371 date of De Brito is September 15, 2000. Therefore, De Brito has an effective filing date of September 15, 2000 which is after the December 30, 1998 priority date of the present application. Therefore, Applicants respectfully request that this rejection be withdrawn.

Claim 53 was rejected under 35 U.S.C. §103(a) as being unpatentable over Tognazzini in view of Nojima (U.S. Patent No. 5,933,080). This rejection is respectfully traversed for at least the following reasons.

Tognazzini is discussed above. Nojima discloses an emergency calling system. When it is necessary to make an emergency call about a vehicle station, a Mayday center performs an emergency call to a plurality of emergency contacts in an order of priority according to the vehicle station's present location. The order of priority of the emergency contact addresses is determined according to vehicle station location.

Claim 53 is dependent upon claim 48. As outlined above, Tognazzini does not disclose or suggest all of the elements of claim 48. Additionally, Nojima does not cure

the deficiencies in Tognazzini with respect to claim 48, since Nojima also fails to disclose or suggest “selecting at least one of the stations for the connection based on the location information stored in the register and the location criteria.” Accordingly, the combination of Tognazzini and Nojima fails to disclose or suggest all of the elements of claim 53. Furthermore, claim 53 should be allowed for at least its dependence upon claim 48, and for the specific limitations recited therein.

Claim 68 was rejected under 35 U.S.C. §103(a) as being unpatentable over Tognazzini in view of Tayloe (U.S. Patent No. 5,809,418). This rejection is respectfully traversed for at least the following reasons.

Tognazzini is discussed above. Tayloe discloses a position dependent call connection method and apparatus in a radio communication system. Tayloe further discloses calculating opportunity times when there is a high likelihood of establishing a link between a target communication unit and a satellite. These opportunities are calculated by predicting the satellite’s future positions with respect to an optimal call initiation area. The opportunity times are sent to the source communication unit so that the user knows when to attempt another call.

Claim 68 is dependent upon claim 45. As outlined above, Tognazzini does not disclose or suggest all of the elements of claim 45. Additionally, Tayloe does not cure the deficiencies in Tognazzini with respect to claim 45, since Tayloe also fails to disclose or suggest “selecting at least one of the second stations for connection, when said connection request is received, based on stored location information and the location

criteria in the received connection request.” Accordingly, the combination of Tognazzini and Tayloe fails to disclose or suggest all of the elements of claim 68. Furthermore, claim 68 should be allowed for at least its dependence upon claim 45, and for the specific limitations recited therein.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant’s undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Additional Claim Fee Transmittal
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